

MATTHEW W. GRIMSHAW, SBN 210424
GRIMSHAW LAW GROUP, P.C.
130 Newport Center Drive, Ste. 140
Newport Beach, California 92660
Tel: (949) 734-0187
Email: matt@grimshawlawgroup.com

BILL ROBINS III, SBN 296101
ROBERT T. BRYSON, SBN 156953
KEVIN POLLACK, SBN 272786
ROBINS CLOUD LLP
808 Wilshire Blvd., Ste. 450
Santa Monica, CA 90401
Tel: (310) 929-4200
Email: rbryson@robinscloud.com

Attorneys for Robert O'Brien individually and as
guardian ad litem for McKenna O'Brien and Kinsey
O'Brien; Mary Ellsworth; and Joshua Ellsworth

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re) Case No. 19-30088 (DM)
PG&E CORPORATION,)
) Chapter 11
and)
PACIFIC GAS AND ELECTRIC) (Lead Case—Jointly Administered)
COMPANY)
Debtors) Notice of Motion to Amend Proofs of
) Claim Nos. 27893 Filed by Raam
) Pandeya and 28997 Filed by Sophia Ali,
Affects:) or Alternatively, for the Allowance of a
) Late-Filed Claim
<input type="checkbox"/> PG&E Corporation)
<input type="checkbox"/> Pacific Gas & Electric Company) Date: February 24, 2021
<input checked="" type="checkbox"/> Both Debtors) Time: 10:00 a.m. (Pacific)
) Place: Telephonic/Video Appearance Only
* All papers shall be filed in the Lead) United States Bankruptcy
Case, No. 19-30088 (DM).) Courtroom 17,
) 450 Golden Gate Ave., 16th Floor
) San Francisco, CA 94102
)
	Objection Deadline: February 17, 2021

1 **PLEASE TAKE NOTICE** that on January 30, 2021, as Dk. No. 10058, Robert O'Brien
2 individually and as *guardian ad litem* for McKenna O'Brien and Kinsey O'Brien; Mary Ellsworth;
3 and Joshua Ellsworth (collectively, "Movants") filed a motion to amend Proof of Claim Nos. 28994
4 ("Claim") or, alternatively, for the allowance of a late-filed claim arising from damage caused by the
5 2017 North Bay Fire ("Motion").

6 **PLEASE TAKE FURTHER NOTICE** that a telephonic hearing on the Motion will held on
7 February 24, 2021, at 10:00 a.m. (Pacific Time) in the Courtroom of the Honorable Dennis Montali,
8 United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San Francisco,
9 CA 91402.

10 **PLEASE TAKE FURTHER NOTICE** that all interested parties should consult the
11 Bankruptcy Court's website at www.canb.uscourts.gov for information about court operations during
12 the COVID-19 pandemic. The Bankruptcy Court's website provides information regarding how to
13 arrange a telephonic or video appearance. If you have any questions regarding how to appear at a
14 court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live
15 Chat feature on the Bankruptcy Court's website.

16 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion must
17 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Movants at the
18 above-referenced addresses so as to be received by the time set by the Bankruptcy Court. Any
19 oppositions or responses must also be filed and served on all "Standard Parties" as defined in, and in
20 accordance with, the Second Amended Order Implementing Certain Notice and Case Management
21 Procedures entered on May 14, 2019 (EFC No. 1996) ("Case Management Order"). Any relief
22 requested in the Motion may be granted without a hearing if no opposition is timely filed and served
23 in accordance with the Case Management Order. In deciding the Motion, the Court may consider any
24 other document filed in these Chapter 11 Cases and related adversary proceedings.

25 **PLEASE TAKE FURTHER NOTICE THAT** that copies of the Motion and its supporting
26 papers can be viewed and/or obtained: (i) by accessing the Court's website at
27 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
28 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime

1 Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
2 U.S.-based parties; or +1 (929) 333-8977 for International parties or by email at:
3 pgeinfo@primeclerk.com.

4 Note that a PACER password is needed to access documents on the Bankruptcy Court's
5 website.

6 Respectfully submitted,

7 Dated: January 29, 2021

GRIMSHAW LAW GROUP, P.C.



9 By: _____
10 MATTHEW W. GRIMSHAW

11 Dated: January 29, 2021

ROBINS CLOUD LLP



13 By: _____
14 ROBERT T. BRYSON

15 Attorneys for Robert O'Brien individually and as
16 *guardian ad litem* for McKenna O'Brien and
17 Kinsey O'Brien; Mary Ellsworth; and Joshua
18 Ellsworth